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May 27, 2020

BY ECF

Honorable James Orenstein
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Galloway v. County of Nassau, et al.*, 19 CV 5026 (AMD) (JO)

Your Honor:

I represent plaintiff in the above-referenced matter. I write to respectfully request an extension of plaintiff's amendment deadline from June 1, 2020 until June 15, 2020. Defendants consent to this request.¹

By Rule 16 Scheduling Order dated April 2, 2020, plaintiff was granted until June 1st to amend his pleading and join additional parties. DE #57(I). As is the practice of the undersigned, plaintiff had proposed the June 1st amendment deadline so that he would have the benefit of defendants' discovery responses when formulating any amendment. Indeed, plaintiff served document requests and identification interrogatories on defendants on April 2nd.

Shortly before defendants' responses were due, by e-mail on April 27, 2020, counsel to the Nassau County defendants first requested plaintiff's consent to an extension of their response deadline. The parties thereafter conferred and plaintiff

¹ If it should please the Court, Nassau County defendants articulated their position as follows: "[W]e...consent to your request, but given that we expect to need time beyond June 15 for the production of documents given the difficulties caused by the pandemic emergency and its effects on the Nassau County Police Department, we believe the extension should be longer."

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consented to a thirty-day extension for all defendants to serve responses, moving the operative deadline to June 1st. *See* DE #57(II)(b).

In order to allow plaintiff a meaningful opportunity to review defendants' responses in advance of drafting any amendment, plaintiff respectfully requests, on consent, that the deadline be extended until June 15th.

No prior request for an extension of this deadline has been submitted. The proposed extension will not affect any other previously-scheduled deadlines.²

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: Defense Counsel

² If it should please the Court, in preparing the instant letter the undersigned observed two apparent typographical errors in the Scheduling Order at DE 57(I) that plaintiff respectfully brings to the Court's attention: the year for filing dispositive motions and the pre-trial order appears to be incorrect.